IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

In re: Equifax, Inc. Customer Data Security Breach Litigation MDL Docket No. 2800 No. 1:17-md-2800-TWT

This document relates to:

SMALL BUSINESS CASES

MOTION TO DISMISS CONSOLIDATED SMALL BUSINESS CLASS ACTION COMPLAINT

Under Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, Equifax moves to dismiss Plaintiffs' Consolidated Small Business Class Action Complaint (Dkt. No. 375) for the reasons set out in the accompanying memorandum of law.

DATED: July 30, 2018

Respectfully Submitted,

/s/ David L. Balser

KING & SPALDING LLP

David L. Balser Georgia Bar No. 035835 Phyllis B. Sumner Georgia Bar No. 692165 S. Stewart Haskins II Georgia Bar No. 336104 Elizabeth D. Adler Georgia Bar No. 558185 John C. Toro Georgia Bar No. 175145

1180 Peachtree Street, N.E. Atlanta, Georgia 30309
Tel.: (404) 572-4600
Fax: (404) 572-5140
dbalser@kslaw.com
psumner@kslaw.com
shaskins@kslaw.com
eadler@kslaw.com
jtoro@kslaw.com

Counsel for Equifax Defendants

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ David L. Balser
David L. Balser